



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

27 DEC 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Article Number: 7004 2510 0006 9720 5451

Mr. Shawn McAfee
Metzeler Automotive
3200 Main Street
Keokuk, Iowa 52362

RE: Defining Area of Property Subject to Restrictions for the Vapor Intrusion Pathway
Former Sheller Globe Facility, 3200 Main Street, Keokuk, Iowa
EPA RCRA ID # IAD005136023

Dear Mr. McAfee:

The U.S. Environmental Protection Agency (EPA) Region 7 is in receipt of the December 14, 2007 letter submitted on your behalf by MACTEC, Inc. transmitting responses to EPA comments regarding the report entitled, *Defining Area of Property Subject to Restrictions for the Vapor Intrusion Pathway* (hereinafter, "Vapor Intrusion Screening") for the above referenced facility.

For the most part, the responses to EPA comments adequately address the deficiencies cited in our November 5, 2007 letter. However, the November 26, 2007 "Operation & Maintenance Plan" provides for annual certification of compliance with the proposed restrictive environmental covenant. If Schlegel Corporation (d.b.a., Metzeler Automotive) intends to limit the scope of the restrictive covenant to only a portion of the property, the annual certification must include data verifying that the delineated boundaries of the covenant remains adequately protective for the designated uses.

Therefore, the environmental covenant and the "Operation & Maintenance Plan" must establish a reasonable schedule for sampling the pertinent delineation wells (i.e., MW-6A/B, MW-14, MW-17A/B, MW-18, MW-19, MW-20, and OP-3) to verify that the prescribed boundary for the restrictive covenant is adequate. If any of these monitoring wells have been abandoned or are no longer viable for groundwater sampling, replacement wells must be installed. Within thirty (30) days of receipt of this letter, please submit a revised Vapor Intrusion Screening report that incorporates the revisions outlined in your December 14, 2007 responses to comments, and the modifications discussed in this letter. Feel free to contact me at (913) 551-7328 if you have any questions.

Sincerely,

Michael B. Davis
RCRA Corrective Action and Permits Branch
Air & Waste Management Division

cc: Dale Guariglia
Bryan Cave



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RCRA Corrective Action and Permits Branch
Air & Waste Management Division

cc: Dale Guariglia, Bryan Cave (w/ enclosure)
bcc: Howard Bunch (w/ enclosure)

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